

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
(Philadelphia Division)**

IN RE:

DESIREE M. KAKOS  
EVANGELOS G. KAKOS

Case No. 21-10217-amc  
(Chapter 13)

Debtors

\* \* \* \* \*

TOWER  
FEDERAL CREDIT UNION

Judge Chan  
Date: 07/06/2021  
Time: 11:00 am  
Courtroom #4

Movant

v.

DESIREE M. KAKOS  
(Debtor)

EVANGELOS G. KAKOS  
(Joint Debtor)

AND

WILLIAM C. MILLER, ESQ.  
(Chapter 13 Trustee)

Respondents

\* \* \* \* \*

**NOTICE OF MOTION FOR RELIEF AND HEARING THEREON**

Tower Federal Credit Union has filed papers with the Court requesting relief from the automatic stay as to 301 Fawn Lane, Phoenixville, PA 19460 currently in the possession of Desiree M. Kakos and Evangelos G. Kakos under Section 11 U.S.C. Section 362(d). **YOUR RIGHTS MAY BE AFFECTED.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not wish the Court to grant the relief sought in the motion, or if you want the Court to consider your views on the motion, then within **fourteen (14) days (Objection Due Date June 23, 2021)** from the date of service of this motion, you or your attorney must file a written response explaining your position with the Court at the following address:

United States Bankruptcy Court for the Eastern District of Pennsylvania  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

and serve a copy on the Movant attorney at the address shown below. Unless a written response is filed and served within the fourteen (14) day period, the court may deem your opposition waived, treat the motion as conceded, and issue and order granting the requested relief.

If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the expiration of the fourteen (14) day period.

Attend the preliminary hearing scheduled to be held on **07/06/2021 at 11:00 AM** in Courtroom #4 of the U.S. Bankruptcy Court for the Eastern District of Pennsylvania, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Suite 400, Philadelphia, PA 19107.

**If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.**

DATED: 06/09/2021

/s/ Douglas R. Blecki, Jr.  
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***Attorney for Tower Federal Credit Union***